

EXHIBIT B

Page 1

1
2 SUPREME COURT OF THE STATE OF NEW YORK

3 COUNTY OF NEW YORK

4 Index No. 154123/2021

5 -----x

6 SARA TIRSCHWELL FOR MAYOR, INC., and SARA
7 TIRSCHWELL,

8 Plaintiffs,

9
10 - against -

11
12 STEVE KRAMER d/b/a GET OUT THE VOTE,

13 Defendants.

14 -----x

15 March 21, 2023

16 10:06 a.m.

17
18 EXAMINATION BEFORE TRIAL of a Defendant,
19 STEVE KRAMER, pursuant to Notice, held at the
20 offices of Hartzog Law, PLLC, 1185 Avenue of the
21 Americas, New York, New York 10036 before Mandy
22 Fein, a Notary Public of the State of New York.
23
24
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2 A P P E A R A N C E S :

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7 Attorney for Plaintiffs

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9 BY: EDWARD P. DOLIDO, ESQ

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17 BY: EDWARD A. HARTZOG, ESQ

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IT IS HEREBY STIPULATED, by and between the attorneys for the respective parties hereto, that:

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The filing of the original of this

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deposition is waived.

IT IS FURTHER STIPULATED, a copy of this
examination shall be furnished to the attorney
for the witness being examined without charge.

* * *

1 KRAMER

2 they want, and then when I was a little older,
3 I joined the Lex Club over on the East Side.
4 When I say older, I'm talking 12. No one in
5 that club was within 30 years of me. So, I
6 have always been around it.

7 Q After Fashion Institute of
8 Technology, you went to Saatchi & Saatchi?

9 A No. I was working for the governor
10 for a brief time, just for campaign stuff.
11 They had me on the campaign stuff.

12 Saatchi & Saatchi was just a two year
13 gig. I got sick of getting coffee for everybody.
14 I helped bring in the Nike account and then I got
15 out, and I worked on campaigns -- well, really
16 since I was six years old, but back in a
17 full-time, paid capacity since 20, 21 years old,
18 but there was never a time in my life that I
19 haven't worked on campaigns.

20 Q How old are you now?

21 A 53.

22 Q After your two years with Saatchi,
23 did you work for somebody else?

24 A Yeah. I was on the campaign trail.
25 I worked for -- right now I handle 59 members

1 KRAMER

2 of congress. I do seven governors. Kathy
3 Hochul used to work for me.

4 Q In what capacity?

5 A She was a press secretary on a
6 campaign that I did in Buffalo. Jen Psaki,
7 who was the president's former press secretary
8 used to work for me. There are two dozens
9 consultants around America that have worked
10 for me at different times, whether it be in a
11 research role, sometimes in a sales capacity
12 or associate capacity, other times as just
13 field captain where they're out helping people
14 knock on doors, things like that. There isn't
15 a time, again, that I haven't worked in
16 politics. Here in New York it's almost, I
17 wouldn't call it a hobby, but it is less of
18 the business end I've had in the previous
19 times. In other words, no less in business, I
20 still do a lot of people over here, but
21 because I do so much nationally and
22 internationally, when I'm here, I try and do
23 as much as I can in the month of March when I
24 do petitioning and month of June right before
25 the primary used to be August right before

Page 10

1 KRAMER

2 September but now they switched it.

3 So, I am here typically three to five
4 months out of the year. It depends on the year.
5 I am in the south most -- most particularly in
6 Mobile address you have and New Orleans, much in
7 the same way you might have a Hamptons and New
8 York experience, it is the same type of
9 experience for me there. Alabama is still very
10 inexpensive what you spend for rent, I might buy
11 a house. But from a campaign perspective, 100's.
12 I was running three, four campaigns
13 simultaneously at age 19.

14 When I graduated, I was told to
15 concentrate on one at a time until you can move
16 up fast, so I did. So, I did a lot of
17 congressional races. We did different statewide
18 and assembly, and other things here in New York,
19 and other states. I work in 38 states right now.

20 Again, there has never been a time I
21 didn't work in politics. The two times I was
22 forced to do more what you and I would consider
23 to be government time, I was chief of staff for
24 someone, in both interim roles where I had helped
25 elect someone, because they are either lead

Page 11

1 KRAMER

2 consultant or other people that they trusted, and
3 I was brought in to fill in as an interim chief
4 of staff, or what they used to call executive
5 assistant, or AA, back in the old days.

6 Q AA?

7 A AA. It was --

8 Q Administrative assistant?

9 A It is, but it wasn't the lower title
10 that you would think right now. It was more
11 of a chief of staff position in DC. So, I was
12 brought in as an interim guy twice, even
13 though I was young, everybody knew me. So, I
14 was able to transition a new team for whatever
15 congressional -- two different congressional
16 offices from whatever person they had fired,
17 typically, chief of staff, and then bring in
18 some other people, junior staff. Both of
19 those didn't go more than maybe three months,
20 three, four months.

21 Q Who were those congressmen?

22 A Bart Stupak who is a member of
23 Venable, one of the firms that I am sure you
24 are familiar with. And then the other was for
25 Jim Maloney, who I had done a lot of

Page 12

1 KRAMER

2 consulting for up in Connecticut. Again, they
3 just brought me in for three or four months, I
4 can't remember the exact dates, where they had
5 let someone go and they wanted me to just
6 reorganize the staff and get back on the
7 campaign trail, not necessarily for them, but
8 just in general. I am not a legislative
9 person. I like to win. That is why I am on
10 the campaign trail and always been on the
11 campaign trail.

12 Q So, Saatchi & Saatchi was the last
13 time you worked for somebody else?

14 A No. No. I work for people all the
15 time. We do candidates. I do unions, I do
16 political action committees, I do any number
17 of organizations on a nonprofit level
18 sometimes too where they have different
19 legislation they are trying to choose to do,
20 but I -- it doesn't pay. I worked for
21 Democracy Data for a little while which is a
22 correct subsidiary of Direct Impact. That was
23 a lobbying firm that they had me there to --
24 to fix problems sometimes. They had about 120
25 people at the time. About eight of us were

Page 13

1 KRAMER

2 democrats. So, they were having real problems
3 getting into democratic offices.

4 So, Direct Impact hired me through
5 Democracy Data at a very junior age, I am talking
6 28, 29, something like that to get them into some
7 of the democratic offices where I either had
8 former clients or people I just knew. So, I
9 would say in the approximately year that I worked
10 over there, I was one of eight democrats in the
11 whole firm, including callers, and I was one of
12 three people who was getting them in some of
13 those democratic offices that they needed to be.

14 Q When you say you worked for these
15 people, you worked as a consultant or as an
16 employee?

17 A That is a good question, Democracy
18 Data it was -- it was as an employee. With
19 Saatchi & Saatchi, we just did it as a
20 consultancy. The congressman who I had worked
21 with previously, Jim Maloney, asked me to set
22 up an LLC and he said I could earn more money
23 as an LLC than I would as a regular employee.
24 Plus, I was still young enough to get health
25 benefits on my parent's thing, so he said that

1 KRAMER

2 was the thing to do. So, I just helped the
3 guy get elected to congress, so I listened to
4 what he had to say.

5 Q Get Out The Vote is not an LLC?

6 A It has been an LLC. We've registered
7 in a few states. I don't know exactly what
8 all our statuses are, I am not an accountant.
9 So, in that respect, I am not knowledgeable
10 about all the financial stuff, but it is.

11 Q When did you form Get Out The Vote?

12 A Probably the first time was either
13 Delaware or Nevada, either 1999 or 1998. The
14 second time would have been in a
15 reincorporation here or re-LLC'ing here in New
16 York State, maybe around 2011, 2012, something
17 like that. Again, I am sorry that I don't
18 have the exact.

19 Q It doesn't have to be exact, that's
20 fine.

21 You mentioned you do international work.
22 How did that come about?

23 A I made a documentary in Paris called
24 Democracia France. So, it's a documentary
25 about what was going on with the presidential

Page 15

KRAMER

election back in 2007. It was a very contentious election between Sarkozy and Le Pen, whose daughter is now running, Segolene Royal, first very serious female candidate that they had for president and then Bayrou, who would be Ross Perot in our type of politics. They had 19 different parties. We did something called the Democracia France which in the same way they had, it took democracy in America, which was a book in the 1800's that we modeled it after, and that we would be Americans running around interviewing people. We interviewed 500 different people on the street and then about 106, I think it was, elected officials of which 15 of them I got as clients, mostly just for cause and outbound work. It's not as accepted to do door-to-door in France, or at least back then it wasn't, as it is to call them or what we would do now is text them, which we do sometimes too. So, we had 15 members of the Assembly National, it about two years after the documentary came out that we did that. The documentary cost \$301,000 to make. I

Page 16

1 KRAMER

2 raised \$310,000, mostly from dentists, and we
3 were one of the first documentaries to break
4 even in France. I never -- for me, it's not
5 possible not to pay off the people that
6 invest, so I made great strides to make that
7 happen as far as keeping costs down.

8 Anyways, so the work I do in Europe is
9 in Paris for mostly Assembly National candidates.
10 They are mostly reelects, so they are easy. In
11 Holland we did some stuff for the European MP's,
12 which is a much lower budger, but gets you in
13 office in Amsterdam, and then, in Italy we did a
14 program where we helped people who were eligible
15 to vote in the Italian election, I can't remember
16 the year, but Canadian and American residents who
17 had Italian parents or parents who had been born
18 in Italy and had emigrated here from Italy to the
19 United States or Canada could still vote in the
20 election. So, they gave us different lists and
21 we targeted them with calls and mail. I did that
22 with the folks from Prime New York, which are
23 also one of the prominent firms here.

24 And then in Greece we just did automated
25 calls, we got called by one of the centrist

Page 17

1 KRAMER

2 parties or someone who was running for president.
3 I want to say that was 2004, 2005. They had
4 three elections within a short period of time, I
5 think 13 months, so we were involved in one of
6 them. We aren't involved with that party just
7 because that party has changed significantly
8 since then. I don't speak Greek. So, the person
9 who we had as our liaison went on into
10 government, so they couldn't work with us
11 directly anymore.

12 Those are the four places I do European
13 stuff. I get called from different other
14 consultants who are members of the International
15 Association Of Political Consultants, which I am
16 a member of. From time to time I just do calls
17 or texts, nothing on the ground. Again, it is
18 not as accepted there as it is here. Sorry if
19 that was too long.

20 Q No. That was great. It saved me a
21 lot of questions. Maybe let's focus on New
22 York City races.

23 Who did you represent, if anyone, in the
24 mayoral election, last mayoral election?

25 A Obviously we helped out Sara to get

Page 18

KRAMER

her on the ballot on the Republican side. We have a certain amount of democratic staff as well. They were helping Ray McGuire, who on the democratic side, to run for mayor, and that's it. We got offers from almost everybody. Everybody knows me. I've known Ray for a few years, so we agreed to be a supplement from another firm where they had a contract and we were a subcontractor to them. I think they needed another thousand signatures or something like that and then we did Sara, really at the last minute because they called us right before the petitioning, she didn't call me, but a couple of the consultants that were working with her called me to help out possibly for, you know, her run on the Republican side.

I know Curtis. I don't know Mateo at all or Madio, or however it is pronounced. I only know Curtis because I have worked in politics.

Q Curtis Silvo?

A Yeah. In fact, there was a fundraiser they did last week for a candidate

Page 19

KRAMER

they were handling. They knew each other separately, so we did some of the texts for that particular event. But he had and I, you know, it is interesting, I've known Curtis a long time, but we hadn't spoken during the mayoral thing. We got reached out by a couple of packs, but by then, we were already involved with Sara, so I had to turn him down.

Q How did you come to get involved with Sara, and when we say Sara, we are referring to Sara Tirschwell?

A Chapin Fay is a consultant here in town. I don't know if he was working with Mercury at the time, working with a different firm or his own firm, but I've done many campaigns with him in the different organizations that he has been a part of over the years.

So, he called me and asked me if I was interested in getting involved in the Republican Primary and I told him that, you know, explain and so he did, and I never heard of Sara before that day, and I follow politics, obviously. I don't know if she had come up on some of the

Page 20

1 KRAMER

2 campaign finance board forms at the time or not,
3 but she wasn't one of the two candidates
4 everybody was talking about on the Republican
5 side. I was very familiar by the Democratic
6 candidates because we were being solicited by all
7 of them.

8 And then, Chapin called me three days
9 later to say that he wasn't going to be with the
10 campaign any more and then I would be getting a
11 call from Barney Keller who is from Jamestown
12 Associates. I have done work with Jamestown
13 Associates before both nationally, as well as, I
14 think, in Florida we did a couple of campaigns
15 too. Ken Kurson, who you may or may not know, he
16 used to be one of the principals over there and
17 that's when I had a relationship, business
18 relationship, with Jamestown. Barney Keller was
19 someone who I had assumed was a junior person,
20 who was just kind of filling in because Chapin
21 was getting off the campaign, and then, so Barney
22 Keller from Jamestown was our principal contact
23 for that initial time with Sara. He asked me if
24 I was interested and I said I hadn't done a lot
25 of research, but, you know, if she was a

Page 21

1 KRAMER

2 legitimate candidate, we could probably do some
3 stuff with her. So, that is when we started
4 going into negotiations with him and with Sara
5 Tirschwell.

6 Q Before Sara Tirschwell, you've done
7 other mayoral campaigns in New York City?

8 A Yeah.

9 Q Which ones?

10 A Ed Koch came to my house when I was
11 nine years old for dinner, you know, we've --
12 I did Bloomberg twice. We did phone calls the
13 first time in 2001, automated calls only. We
14 did automated calls again through different
15 consultant. The first time it was with a
16 group out of Colorado that was working for the
17 Bloomberg people as their main -- I don't know
18 if they were the main poster, but they were
19 the main live call people and they needed
20 someone to supplement them with live automated
21 calls in 2001. So, we went in and did maybe
22 3 million calls for the Bloomberg campaign
23 that first time, and then in 2005, one of the
24 guys whose a principal over at SKD, which is
25 another major firm, called me and said they

Page 22

1 KRAMER

2 needed calls for Bloomberg for both the
3 campaign, as well as, the Vote Yes Campaign,
4 which was allowing people to run without a
5 party line in 2005. It was an initiative. We
6 were doing stuff for Bloomberg as well as that
7 initiative the Vote Yes which, we were
8 overseeing as an individual.

9 And then we helped Bill Thompson in the
10 following race, which was 2009. Bill Thompson
11 and I play golf together. I've known him since
12 he was a school board president. We just did the
13 very limited calls and texts for some of their
14 fundraising crew back before text was popular.
15 More as a favor. I think we may have even done
16 some of them in kind. I can't say that Emma
17 Bloomberg was very happy, who I am friends with,
18 but, yeah.

19 So then, we did not work with Deblasio's
20 campaign when he first ran. There was a pack
21 that was having us do calls in favor of Deblasio
22 and the name escapes me, the pack we were doing
23 at the time, but we were just doing calls at the
24 time for that mayoral race. There were other
25 candidates that we helped along the way in

Page 23

1 KRAMER

2 different things that were losing candidates.

3 Anthony Wiener, we helped briefly, but he ended

4 up not going to a runoff, instead, he declined

5 going to a runoff. We only did live calls for

6 them. Mark Benoit was my main contact. He works

7 over at Davidson Hutcher. I think he is an

8 attorney, but he was the campaign manager at the

9 time. Again, we were just doing live calls for

10 Anthony Wiener at the time. There was a number

11 of their staffers who were real big comers that

12 all tried to recruit me, and I came on late for

13 them.

14 I am trying to think -- I don't think

15 anybody really ran the second time against -- I

16 have a relation with John Catsimatidis, who took

17 on Bill Deblasio the second time. He's

18 contributed to different efforts that we've done

19 stuff for where other people were doing

20 legislation and Catsimatidis would sometimes help

21 out with calls, or text, or other things he would

22 hire us for through the Red Apple Group, but we

23 never did anything directly for his mayoral

24 campaign, although, I like him personally.

25 I am trying to think any time in the

Page 24

1 KRAMER

2 last 20 years, anybody beyond that that we've
3 done stuff for. I have to think about it a
4 little bit.

5 Q That's enough for now.

6 A Just for the mayoral, that's it.

7 Q What services do you offer in
8 connection with the campaign?

9 A So, we have four core services,
10 automated calls, among one of the largest
11 automated call vendors in the country. I can
12 do 15.4 million calls in a day. Live calls,
13 which are, people to people calls. They come
14 from either our call centers or their homes
15 where we set up them, especially during the
16 pandemic, they can work from home. So, we can
17 do 836,000 30 second calls in a day. It's not
18 the highest in the country as far as capacity
19 goes, but it is a nice supplement for the
20 things that people need especially when they
21 have gotten their list down of who they really
22 want to influence. We do texting. We
23 introduced texting to the East Coast through
24 Hustle at RumbleUp on the Republican side and
25 then a couple of other smaller companies where

Page 25

1 KRAMER

2 people could use that platform to go ahead and
3 text from their campaigns. If they had 20
4 volunteers, they could do their own texting.
5 We typically come -- we started by introducing
6 them and then after the first year, we
7 realized that here we are just teaching people
8 how to do this, and we are spending a lot of
9 time teaching other people how to do someone
10 else's product.

11 So, we took it in-house. I had my call
12 centers underway. We flipped it over to manual
13 blast texting from our call centers where much
14 like you are typing right now, after two key
15 strokes, it loads them with a new person. The
16 second sends a text. You have to send that to
17 each individual person. So, sometimes someone is
18 tapping on their keyboard all day long because
19 they are sending texts. My capacity for texts in
20 a day are 5.5 million. And, again, it is from
21 the same call centers that we were talking about
22 just a minute ago. I have three call centers in
23 the United States. One is in Arlington, Texas.
24 One is a rented facility that I have a business
25 partner who does everything. We just bring in

Page 26

1 KRAMER

2 the business and this is in North Rock, and then
3 I have another East Hartford where we own all the
4 equipment, but they supply the equipment. We use
5 three call centers, text centers because there
6 are days that we have almost capacity, not many,
7 but they do a lot of other things throughout the
8 year, not necessarily with just us. Then the
9 last of our, let's say, four core, again,
10 automated calls, texting, live calls, is
11 door-to-door campaigns. We do 72 hour campaigns
12 we do petitioning campaigns. We do long-term
13 campaigns for both entities like hospitals
14 sometimes for community support when they need to
15 get zoning passed or getting petitions for going
16 on the ballot, or knocking on doors to hand out
17 pamphlets for candidates all around the country.
18 I work in 38 states.

19 Q How many employees do you have?

20 A It depends. On a typical day, 18 to
21 50. If we're running just a minimal capacity
22 with technicians and phone calls that we're
23 doing, so if we're doing, let's say, three
24 campaigns for automated or live calls, if it
25 is live calls it is going to be more people.

Page 45

1 KRAMER

2 is March 22nd through March 25th. Last date
3 to authorized, last date accept, last day
4 file. So, it is looking, and correct me if
5 I'm wrong here, this might have been a
6 shortened period because of the COVID
7 outbreak. It looks like, at least from here,
8 it went from March 2nd through March 25th, and
9 when I say March 25th, that is the last day to
10 file the petitions and stuff. So, it was an
11 abbreviated period. It wasn't the five weeks.
12 It was probably more of a three and a half
13 week period.

14 Q So, the petition period started March
15 2nd, 2021.

16 When did you start working for Sara
17 Tirschwell?

18 A The first conversation that we had
19 with her campaign was, again, with Chapin Fay,
20 who was still a part of their campaign, who
21 reached out to me, asked me if I was
22 interested. I told them I wanted to know a
23 little bit more about the candidate. It took
24 them about a day to get one page on her other
25 than what we can find on-line. I would say

Page 46

1 KRAMER

2 that was within a couple of days of that end
3 of February time period. Then we got a call
4 from Chapin Fay again a few days later saying
5 he wasn't on the campaign any more, he didn't
6 go into the longer reason. He had said some
7 things about her and we took it to note, and
8 then, he said I would be getting a call from
9 Barney Keller who was with Jamestown
10 Associates. I would say that's around that
11 same 27th or 28th. It was leap year and
12 March 1st time period, but it was definitely
13 just before the very beginning of the petition
14 period.

15 Typically, we have everything set up for
16 that first couple of weeks with at least a few
17 campaigns that we're gonna be working with. So,
18 they get their materials over to us, they get
19 their petitions over to us, any special
20 instructions or script that they typically use
21 for a campaign, but it sounded like that Sara's
22 campaign was going through transition at that
23 time between the Chapin Fay and Barney Keller.
24 Barney Keller may have been there earlier, but I
25 got a call from Barney within a day, they had me

Page 47

1 KRAMER

2 on the phone with Sara to explain our process and
3 who I am all that. Took about two days of
4 negotiating with Sara to come to what level she
5 was comfortable with or had negotiated, I should
6 say, and then we got started literally they had
7 drafted a petition previously to us, and gotten
8 it over to us, and we looked it over, it looked
9 fine to us, but then they found a mistake with
10 one of the addresses, I believe it was Sara's
11 address of her home. Because I have a
12 relationship at the printer, they were able to
13 move things up a little bit, but not
14 significantly. So, what we did was we printed
15 some petitions in-house so we can get started.
16 We had a staff ready to go. They were willing to
17 give the go ahead. And then that print shop,
18 which is, US Print -- no, New York Print and they
19 do most of the printing, at least, of petitions
20 for well over half of the candidates that run
21 anywhere in New York City just because they do it
22 right.

23 So, that's how that started. Barney
24 Keller is the one who gave us the green light to
25 talk to Sara. Sara negotiated with me and Barney

Page 48

1 KRAMER

2 for about a day, maybe two days total. Jim Tyrel
3 from Venable drew up the contract and we would
4 read it for half a day, signed it and started. I
5 would say that the first or second day we were
6 already out there with the change, but it took a
7 few days for the print shop to do the printed
8 petitions that we would use for the preponderance
9 of the campaign.

10 Q Thank you.

11 MR. DOLIDO: Please mark this as
12 Plaintiffs' Exhibit 2.

13 (Email Exchange marked as Plaintiffs'
14 Exhibit 2 for Identification, as of this date.)

15 Q Mr. Kramer, I am showing you a
16 document that's been marked as Plaintiffs'
17 Exhibit 2. It's a series of emails. The
18 first two emails are forwarded from one
19 attorney to the next, from Mr. Hartzog to Mr.
20 Kokhba. All the emails I am going to show you
21 today have that sort of forwarding. Ignore
22 the first two emails.

23 (Exhibit handed to witness.)

24 A You mean between Ed Hartzog and other
25 attorneys?

Page 62

1 KRAMER

2 County, I think that's Line 4 and Line 5, and
3 then Line 8, you have Queens as well. With
4 the date, again, that's more to keep
5 continuity so someone doesn't screw up a page.

6 MR. DOLIDO: Off the record.

7 (Off the record.)

8 Q Mr. Kramer, how many petition
9 gatherers did you have working on Sara's
10 campaign?

11 A We had three different categories of
12 people who were out there, really four. We
13 had people who were registered Republicans who
14 could witness when someone was actually
15 signing, so they would be the one with the
16 clipboard and definitely the petition sheets.
17 We had gatherers, which, much in the same way
18 we were talking about before. Sometimes we
19 had people out there who were just aggressive,
20 find someone, find they are a Republican
21 voter, bring them over to that person and
22 Steve Kramer when he's nine years old bringing
23 over Shelly Silver because you don't have so
24 many Republicans who are willing to do 20 to
25 and \$25 an hour work.

Page 63

1 KRAMER

2 So, we have different people who earn a
3 little bit less, not much, or the same, just are
4 very good. They bring them over to that petition
5 person whose holding the clipboard. So,
6 typically, the person whose gathering, the one
7 whose got literature, pencils or chum, or
8 whatever that campaign is giving out, and then
9 bring them over to that Republican petition
10 person. We had drivers who drive people from
11 whatever location they are at to -- so,
12 typically, subway stop and we will move them over
13 to a group of buildings, let's say, in Riverdale
14 or certain parts of Jewish Brooklyn where we know
15 there were typically more Republicans, and then
16 we would give them a list of the people in that
17 building and they would go into that building.
18 Sometimes we had access granted by a resident.
19 Sometimes we had to maneuver our way in, which is
20 not untypical, and then there is a captain who
21 coordinates an entire time. So, an entire team
22 is typically anywhere from 8 to 15 people
23 depending on where they are, what the number of
24 petition people that they have there. So, they
25 might have five petition people out there who are

1 KRAMER

2 able to witness. They might have five getters as
3 we were talking about before or gatherers, a
4 driver and then a captain. Typically on any team
5 that we've got out there and I think we had at
6 any given time five to eight teams for Sara in
7 different neighborhoods.

8 Q So, how many gatherers?

9 A Verses people who were --

10 Q Verses drivers or verses these other
11 categories?

12 A I would have to look. I have all the
13 time sheets because, as you probably know, the
14 Campaign Finance Board requires all that
15 information. So, we keep accurate information
16 about who was our drivers, who was our people
17 who were petition gatherers, and I think there
18 is probably a chart somewhere of the actual
19 names of the petitions. It changes from
20 campaign to campaign. Not every candidate is
21 liked by every petition gatherer, so they work
22 on certain ones, and then the number of
23 captains would have been probably eight
24 captains total on any given day. It might be
25 five to eight, depending on who was working,

Page 65

1 KRAMER

2 what shift they were working and such. So, on
3 any given day we might have as many as 40, 45
4 people out there for her, but certain days, if
5 it was raining, it might be less.

6 Q In addition to the time sheets,
7 you'll also have payroll records, correct?

8 A The time sheets are the payroll
9 records. So, what happens is we have to by
10 law or by Campaign Finance Board Law here in
11 New York State, which I don't know if she's in
12 the program or not, but I am sure she had to
13 submit things to the Campaign Finance Board
14 about who was working with her campaign, not
15 just who she is paying for her consultants,
16 printers or media people, fundraisers or all
17 the other stuff, but there is a subcontractor
18 form that we would fill out for every campaign
19 because we do it for every campaign, and we
20 don't subcontract, we have it internal, and
21 then we provide time sheets to the Campaign
22 Finance Board on each of the campaigns that we
23 work with, so we have all those.

24 MR. DOLIDO: We will ask for their
25 production.

Page 122

1 KRAMER

2 candidates or Democratic candidates who were
3 Democrats running for especially City Council
4 at that same time. We may have done a DA race
5 at the same time.

6 Q Not mayor?

7 A No. As I mentioned before, Ray
8 McGuire we were doing for the Democrats.

9 Q You did the petitions for the Ray
10 McGuire --

11 A We were a subcontractor to do
12 petitions for the Ray McGuire campaign for one
13 of the other main contractors that I think he
14 had five or six main contractors. We would
15 have been a subcontractor to them for a
16 certain amount of block of time or block of
17 canvassers in the same way. Hers was just a
18 direct relationship with the campaign rather
19 than being through another contractor, the
20 subcontractor. So, the subcontractor form we
21 have to fill out. Most times we just say no,
22 we didn't subcontract because we don't. We
23 are usually the main body or someone
24 subcontracts to us, someone else would have to
25 fill out that form. That is how it would have

Page 123

1 KRAMER

2 been.

3 Q Is the training documented in
4 writing?

5 A No. We had gone with things like
6 that before, but then every campaign is
7 different. If you're doing something in
8 California, it is different than something in
9 Florida as far as what you are required to do
10 and required to collect. For example, in Ohio
11 we were doing nuclear energy. In Florida we
12 helped out a little bit on casino gambling.
13 Both of those initiatives had one signature
14 per page and then witness statement. Totally
15 different than 10 or 15, or 5, whatever it
16 maybe.

17 So, every single campaign is a little
18 different how they want things done and we work
19 with that campaign. Typically, you have someone
20 from a campaign who likes to be the person that
21 teaches everybody how to do it. What I mean is,
22 typically, it is an election law attorney who
23 is -- just wants to do it the right way, so they
24 might do a training. At this campaign, it would
25 have been on-line, but she didn't because of the

Page 124

1 KRAMER

2 COVID pandemic, it was tougher to recruit some of
3 the people that we would typically have or
4 tougher to get petition signatures that we
5 typically had. So, we probably included things
6 like wearing your mask, not touching anybody and
7 making sure you had multiple pens in case someone
8 wanted to keep the pen that they would go ahead
9 and use. Those are just slight tweaks. While if
10 we were doing something for Kanye West, where you
11 can get any voter whose actually a voter, we had
12 some of the same health procedures that we had to
13 go through, because it was, again, maybe within a
14 year of this campaign, but each campaign is just
15 different. So, having a training on what to do
16 doesn't always apply to every single state, but
17 we do, we put everybody through training.

18 Q Who did the training for Sara's team?

19 A Each of the captains.

20 Q Who are the captains?

21 A I don't have the list in front of me.

22 Q Where would I look to determine who
23 the captains are?

24 A We can get you that list.

25 Q Okay.

Page 125

1 KRAMER

2 A And it would be in the time sheets
3 too because it is listed in the time sheets
4 what their role was in each case, whether it
5 is a driver, getter. You probably have it,
6 but that thick.

7 Q Got you. Thank you.

8 The next bullet under the sub bullets
9 says, 29 Paid Petitioners.

10 How many petitioners did you have?

11 A Again, it just depends. We had the
12 witnesses and then we had the getters, and
13 then we had the drivers. So, the canvas team,
14 paid petitioners, volunteer petitioners also.
15 So, technically, that could be considered some
16 of her volunteer petitioners too that we were
17 overseeing. The poster and the sign screw,
18 field support staff are just people who were,
19 again, people that were drivers, people who
20 were putting up signs on people's businesses.
21 She didn't have any signs. All she had was
22 the sign that we had.

23 So, that would have been a part of that
24 crew. Field support staff, again, some of the
25 people that we mentioned as far as looking up

Page 173

1 KRAMER

2 a long conversation. It is more of just making
3 sure that you're in the district or portion of
4 the district.

5 Q Exhibit B, compensation reflects 26
6 petitioners at \$125 a shift.

7 They didn't get paid \$125 a shift?

8 A \$25 an hour.

9 Q \$25 an hour?

10 A Yeah, five hour shifts. Five hour
11 shifts times 25 is \$125. Occasionally, we
12 have to take out insurance on people who work
13 a certain number of hours like 37 hours or
14 more, we will take out insurance on them.
15 Some of my staff that is technical, set up the
16 calls, set up the texts, but most of these
17 people, they are on their own insurance.
18 Again, a lot of these people under 25, under
19 their parent's insurance or already have the
20 benefits of having their own insurance, but
21 they're getting \$25 an hour. Drivers get more
22 sometimes and captains definitely get more.
23 Captains are getting 175 a shift.

24 Q How are you making money, let me
25 break that down --